



December 4, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St S.W., Room TW-A325
Washington, DC 20554

RE: GN Docket No. 18-122 "Expanding Flexible Use of the 3.7 to 4.2 GHz Band"

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules¹, this letter provides notice that on November 29, 2018, Max Fenkell from the Aerospace Industries Association (AIA), Jonathan Archer from the General Aviation Manufacturers Association (GAMA), Joseph Cramer from The Boeing Company and Ryan Terry from Lockheed Martin Corporation² met separately with Rachael Bender, legal advisor to Chairman Pai, and Umair Javed, legal advisor to Commissioner Rosenworcel, regarding GN Docket No. 18-122.

During the individual meetings, the group briefed Ms. Bender and Mr. Javed on AIA and GAMA's jointly filed comments in response to the NPRM. The group highlighted the aviation industry's concerns regarding harmful interference to aviation systems critical to the safety of flight.³ In particular, critical aviation safety equipment known as radio altimeters and wireless avionics intra-communications (WAIC) systems operate in the adjacent radio frequency band 4200-4400 MHz.

The radio altimeter is a critical avionics system to the safe operation of flight, specifically the landing of aircraft. The group stressed it is vital to ensure that proper testing of cellular systems operating in the adjacent band is conducted before a new primary mobile allocation of the entire 3700-4200 MHz band is made. To that end, and in order to attempt to understand the effects of any new entrants in the adjacent band on these critical operations in 4200-4400 MHz, the group noted that aviation companies are currently analyzing the potential impact of 5G devices on radio altimeters. Our industry would welcome assistance from the wireless industry to conduct and refine such testing by arranging technical configurations that can produce valuable results to inform feasible implementation schemes.

The parties did express support for an approach that ensures that, if the FCC change its rules, any mobile allocation start at the lower portion of the 3700-4200 MHz band.

Finally, the group discussed the need for continued discussions with the Commission in order to ensure aviation safety is not compromised.

¹ 47 C.F.R. § 1.1206.

² Note: Ryan Terry only attended the meeting with Mr. Javed

³ See, AIA-GAMA comments RE: GN Docket No. 18-122 "Expanding Flexible Use of the 3.7-4.2 GHz Band" filed on 10/29/2018: <https://ecfsapi.fcc.gov/file/1029597421299/FINAL%20AIA%20GAMA%20Comments--GN%20Docket%20No%2018-122.pdf>

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'M Fenkell', written in a cursive style.

Max Fenkell
Manager, Unmanned and Emerging Aviation Technologies
Aerospace Industries Association

cc: Rachael Bender
Umair Javed